

ICC Docket No. 01-0423
Response of Commonwealth Edison Company
To ARES Coalition's Ninth Set of Data Requests
ARES 9.01 through ARES 9.46
To Commonwealth Edison Company
Dated October 2, 2001

OFFICIAL FILE

I.C.C. DOCKET NO. 01-0423
GCI Cross Exhibit No. 39
Witness Valtz
Date 11-8-01 Reporter CLC

Rebuttal Testimony of David R. Helwig

ARES 9.11 Please provide the amount of "investment in distribution reliability" that occurred during the 2000 test year that Mr. Helwig refers to on lines 38-39 of his testimony. Also please provide the amount spent on investment in distribution reliability for the years 1995-1999. If Mr. Helwig is unable to answer this request, other Edison witnesses are directed to respond.

RESPONSE: This data request takes Mr. Helwig's rebuttal testimony out of context. Mr. Helwig's rebuttal testimony, at those lines, reads as follows: "One of the points some witnesses make is that, because strong investment in distribution reliability occurred during the 2000 test year, ComEd's proposed revenue requirement is inflated. That is just not so." (ComEd Ex. 19.0, page 2, lines 38-40)

Mr. Helwig was not referring to a specific amount spent or specific reliability projects, but indicating that at a top-level, investment in distribution reliability has been strong. ComEd does not and cannot track "investment in distribution reliability" as such. Projects are undertaken for numerous reasons, of which reliability improvement would be but one, as was discussed, for example, in the direct testimony of David DeCampli (ComEd Ex. 6.0). Investments to maintain and improve reliability are major drivers of distribution capital projects, but disaggregating distribution capital investments to ascertain the amounts expended solely to improve reliability is not possible. In fact, every capital investment made in the system has an impact on maintaining or improving reliability.

Without waiving its objections, and in the interest of providing useful information, ComEd states that total (transmission and distribution) capital expenditures (amounts expended, not amounts recorded, and not corrected for inflation) in 1995-2000 were as follows (in millions):

1995	1996	1997	1998	1999	2000
\$ 326.3	\$ 345.1	\$ 370.1	\$ 327.4	\$ 509.7	\$ 821.9

Further, ComEd's Annual Reliability Reports that have been published annually since 1998 provide valuable information regarding reliability specific programs. In the 2000 Reliability Report, please see pages B1-B10; in the 1999 Reliability Report, please refer to pages B1-B9. Included in these reports is a list of projects that were undertaken to meet various transmission and distribution reliability

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challenges, detailed descriptions of the projects, and budgeted and actual expenditures. ComEd does not have similar data in the 1998 Reliability Report as that was the first annual report ComEd filed under the Commission's Reliability Rule. For the same reason, this information does not exist for the years prior to 1998.

ComEd previously has answered a host of data requests from the ARES Coalition and other parties relating to the reasons for distribution capital investments and for specific projects, as well as addressing these subjects in testimony.

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